

February 16, 2018


Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

RE: EB Docket No. 06-36
Annual CPNI Certification

Dear Ms. Dortch:

On behalf of our client, Manning Municipal Communications & Television dba MMCTSU, 499 Filer ID 819999, attached is the annual CPNI certification filing covering the year of 2017, pursuant to 47 C.F.R § 64.2009(e).

Sincerely,



Judy Christiansen
Consultant

cc: MMCTSU

Attachment

Annual 47 C.F.R. § 64.2009(e) CPNI Certification Template

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2017

1. Date filed: February 16, 2018
2. Name of company(s) covered by this certification: Manning Municipal Communications & Television dba MMCTSU
3. Form 499 Filer ID: 819999
4. Name of signatory: Mark Winnett
5. Title of signatory: Utility Manager
6. Certification:

I, Mark Winnett, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed  [Signature of an officer, as agent of the carrier]

Attachments: Accompanying Statement explaining CPNI procedures

**Customer Proprietary Network Information
(CPNI)
Certification Filing
for
Manning Municipal Communication and Television System Utility
719 3rd Street, Manning, IA 51455**

- CPNI rules are reviewed on a regular basis with employees. Employees with access to CPNI have been trained on when they are, and are not, authorized to use CPNI.
- The Company does not provide CPNI to third parties.
- The Company has a defined disciplinary process in place for violations and for improper use of any customer information, including CPNI.
- Currently, the Company markets a product or service to its entire customer base or it uses the "total service approach" which allows it to use CPNI to market offerings related to the customer's existing service to which the customer currently subscribes.

If, in the future, the Company wants to use CPNI to market outside the total service approach, a process will be developed for notifying customers of their CPNI rights and for requesting approval to use CPNI. At the same time, a process will be established for noting customer accounts when notification is given and noting the approval/denial status on each customer account. The Company will also establish a supervisory review process for any outbound marketing campaigns.

- The Company does not disclose any CPNI until the customer has been appropriately authenticated.
- The Company promptly notifies a customer whenever a change is made to the customer's address of record.
- The Company has a process in place for handling breaches which includes notification to the USSS and FBI via the FCC online at <http://www.fcc.gov/eb/cpni>.
- An officer of the Company that has personal knowledge that the Company has established operating procedures to ensure that it is in compliance with the CPNI rules will file a Compliance Certification with the FCC by March 1 of each year.

OPERATING PROCEDURES FOR COMPLIANCE WITH CPNI REGULATIONS

Every employee of MMCTSU (the "Utility") has a duty to protect the confidentiality of customer proprietary information ("CPNI"), as defined in 47 U.S.C. § 222(h). For a first violation, an employee will be given a warning and the violation will be noted on the employee's record. An employee will be subject to termination of employment for a second violation.

It is the Utility's policy to not use CPNI for any sales or marketing purpose. No Utility employee shall disclose CPNI to any Utility affiliate or other third party unless such disclosure is required by a lawful subpoena or is used for the following purposes: (1) to bill or collect payment for the Utility's services or (2) to protect the rights or property of the Utility or its customers. A Utility employee that receives or obtains CPNI for the purpose of providing any telecommunications service shall use such information only for such purpose, and shall not use such information for any marketing purpose.

A Utility employee shall disclose CPNI only upon an affirmative request by the customer and only after validating that the person requesting the information is the person that opened the account with the Utility. The validation process must, at a minimum, include asking the person requesting CPNI for the last four digits of the customer's social security number and only disclosing the CPNI if the correct four digits are provided. No Utility employee shall disclose CPNI to a person other than the customer unless the customer provides written authorization affirmatively requesting that the customer's CPNI be disclosed to that person.

The Utility keeps a record of all instances where CPNI is disclosed or provided to third parties, or where third parties are allowed access to CPNI (hereinafter referred to as "the CPNI record"). An employee that discloses CPNI to a third party or allows a third party access to CPNI must add to the CPNI record the name and address of the third party, a description of the reasons for the disclosure of the CPNI, the specific CPNI that was disclosed, and any written authorization from the customer to disclose the CPNI. This record is maintained by the Utility for a minimum period of one year.

The Utility holds training sessions regularly to train employees as to when they are and are not authorized to use or disclose CPNI. Employee attendance at these training sessions is mandatory.

Should the Utility make a decision to modify its prohibition on the use of CPNI for marketing purposes, it will notify all employees of any such modifications. Under no circumstances will CPNI be used for any marketing purpose until after the Utility has sent customers the notices required by 47 C.F.R. § 64.2008 and received the customer opt-in or opt-out approvals required for such use of CPNI. Sales

personnel must obtain written supervisory approval before soliciting customer approval for any out-bound marketing campaign. The Utility will establish a system by which the status of a customer's CPNI approval can be clearly established if the Utility changes its current policy and decides to use CPNI in an out-bound sales or marketing campaign. Upson such a change in Utility policy, employees must add to the CPNI record a description of each such out-bound marketing campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign.